

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KAMILAH BROCK,

Plaintiff,

-against-

THE CITY OF NEW YORK, NEW YORK CITY HEALTH
AND HOSPITALS CORPORATION, HARLEM HOSPITAL,
DR. ELISABETH LESCOUFLAIR, Individually and in her
official capacity, DR. ZANA DOBROSHI, Individually and in
her official capacity, DR. ALAN DUDLEY LABOR,
Individually and in his official capacity, DR. HERMAN
ANDERSON, Individually and in his official capacity, and
POLICE OFFICER SALVADOR DIAZ, Shield No. 21953,
Individually and in his official capacity,

Defendants.
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15-CV-1832 (VSB)

**DECLARATION OF
RYAN LAWLOR
IN SUPPORT OF
PLAINTIFF'S
OPPOSITION TO
DEFENDANTS' MOTION
FOR SUMMARY
JUDGMENT**

RYAN LAWLOR, pursuant to 28 U.S.C. § 1746, and subject to penalty of perjury, declares
the following is true and correct:

1. I am an attorney at the Law Offices of Michael S. Lamonsoff, PLLC, attorneys for the Plaintiff, Kamilah Brock. As such, I am fully familiar with the facts and circumstances of this action. This declaration is submitted to put forth certain documents before this Court in support of Plaintiff's opposition to Defendants' motion for summary judgment.
2. Annexed hereto as Exhibit "A" are portions of Plaintiff's medical records related to this incident.
3. Annexed hereto as Exhibit "B" is the expert report of Dr. Roy Lubit.
4. Annexed hereto as Exhibit "C" is a portion of Defendant Officer Diaz's deposition transcript..
5. Annexed hereto as Exhibit "D" is a portion of Defendant Doctor Herman Anderson's Deposition Transcript.

6. Annexed hereto as Exhibit “E” is a portion of Doctor Nnadi’s deposition transcript.
7. Annexed hereto as Exhibit “F” is a portion of Defendant Doctor Labor’s deposition transcript.
8. Annexed hereto as Exhibit “G” is a portion of Defendant Doctor Dobroshi’s deposition transcript.
9. Annexed hereto as Exhibit “H” is a portion of Defendant Doctor Lescouflair’s deposition transcript.
10. Annexed hereto as exhibit “I” is a portion of Plaintiff Kamilah Brock’s deposition transcript.

Dated: New York, New York
March 23, 2017

/S
Ryan Lawlor (RL-7354)
The Law Offices of Michael S.
Lamonsoff, PLLC
32 Old Slip
New York, NY 10005
Attorneys for Plaintiff

To: **BY FIRST CLASS MAIL & ECF**
Joshua Lax
Assistant Corporation Counsel for the
City of New York
Attorneys for the Defendants